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*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

\_\_\_\_\_  
This Document Relates to:

ALL ACTIONS

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN  
HORN IN SUPPORT OF DEFENDANTS  
UBER TECHNOLOGIES, INC., RASIER,  
LLC, AND RASIER-CA, LLC'S  
ADMINISTRATIVE MOTION FOR ORDER  
ESTABLISHING COMMON FACT  
DISCOVERY CUT-OFF**

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California  
3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber  
4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in this action. I have personal  
5 knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would  
6 competently testify to the facts contained herein.

7 2. Attached as **Exhibit 1** is a true and correct copy of the November 12, 2025 Declaration of  
8 Christopher D. Cox in support of Defendants’ Administrative Motion for Order Establishing Common  
9 Fact Discovery Cut-off.

10 3. Attached as **Exhibit 2** are true and correct collected copies of Orders from MDL Courts  
11 imposing common-discovery deadlines.

12 I declare under penalty of perjury under the laws of the United States and the State of California  
13 that the foregoing is true and correct.

14 Executed on November 12, 2025, in San Francisco, California.

15 /s/ Laura Vartain Horn

16 Laura Vartain Horn  
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**E-FILING ATTESTATION**

I, Laura Vartain Horn, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

/s/ Laura Vartain Horn  
Laura Vartain Horn